

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF RHODE ISLAND**

PAUL ENOS, CHAIRMAN OF THE  
RHODE ISLAND BRICKLAYERS  
BENEFIT FUNDS,  
Plaintiff,

V.

UNION STONE, INC.  
Defendant.

C.A. No. 2011-cv-00098-ML-LDA

## **ANSWER AND AFFIRMATIVE DEFENSES**

Now comes the Defendant and answer the complaint in this matter as follows:

1. Defendant does not have sufficient information to admit or deny this allegation.
2. Defendant does not have sufficient information to admit or deny this allegation.
3. Defendant does not have sufficient information to admit or deny this allegation.
4. Admit that Union Stone, Inc. is a Rhode Island corporation with a principal place of business at 3 Regency Plaza, Suite 23, Providence, RI and state that Defendant does not have sufficient information to admit or deny this allegation.
5. Defendant does not have sufficient information to admit or deny this allegation. Further, the “Agreement” allegedly attached to said Complaint, was not attached to it as served.

6. Defendant does not have sufficient information to admit or deny this allegation.

7. Defendant does not have sufficient information to admit or deny this allegation.

8. Defendant does not have sufficient information to admit or deny this allegation.

9. Defendant does not have sufficient information to admit or deny this allegation.

10. Defendant does not have sufficient information to admit or deny this allegation.

11. Defendant repeats its foregoing responses.

12. Deny.

13. Defendant does not have sufficient information to admit or deny this allegation.

14. Defendant does not have sufficient information to admit or deny this allegation.

15. Defendant does not have sufficient information to admit or deny this allegation.

16. Defendant repeats its foregoing responses.

17. Defendant does not have sufficient information to admit or deny this allegation.

18. Defendant does not have sufficient information to admit or deny this allegation.

### **AFFIRMATIVE DEFENSES**

1. Insufficiency of service of process.
2. The Complaint fails to state a claim upon which relief may be granted.
3. The conditions precedent to bringing this Complaint were not satisfied by Plaintiff, *inter alia*, providing notice and/or demand upon Defendant.
4. The amounts being claimed by Plaintiff are incorrect, subject to offset, and/or deduction.

WHEREFORE, Defendant prays that the Complaint be dismissed with prejudice.

Defendant,  
By its attorneys,

/s/Andrew J. Tine

Andrew J. Tine (#6756)  
Law Offices of Andrew J. Tine  
251 Thames Street, 2<sup>nd</sup> Floor  
Bristol, RI 02809  
(401) 396-9002 – Tel.  
(401) 396-9479 – Fax  
[atine@tinelaw.com](mailto:atine@tinelaw.com)